

SueSteib.041306

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
3 JACKSON DIVISION

4 OLIVIA Y., ET AL. PLAINTIFFS
5 VERSUS CIVIL ACTION NO. 3:04CV251LN
6 HALEY BARBOUR, ET AL. DEFENDANTS

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11 DEPOSITION OF DR. SUE STEIB
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17 Deposition Taken at the Instance of Plaintiffs
18 In the Offices of Bradley, Arant, Rose & White
19 Jackson, Mississippi
20 On April 13, 2006
21 Commencing at 8:45 a.m.

22 REPORTED BY: CHERIE G. BOND, RMR
23 Mississippi CSR #1012

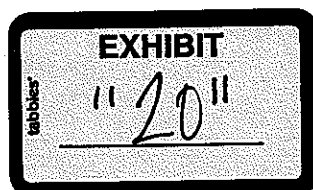
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Brandon, Mississippi 39047
(601) 936-4466

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1 APPEARANCES:
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3 MS. SUSAN LAMBAISE
4 Children's Rights
330 7th Avenue, Fourth Floor
New York, New York 10001

5 REPRESENTING PLAINTIFFS
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7 Q And are you considered -- do you consider
8 yourself a fiscal expert?

9 A No.

10 Q Did you do a fiscal review in this case?

11 A No.

12 Q And you're not offering any opinions that
13 contradict plaintiffs' fiscal expert, Bill Brister?

14 MS. RACHAL: Objection to form.

15 A Only insofar as what our understanding -- I
16 mean, we -- only insofar as what we have been told
17 about some of the additional federal monies that may
18 be made available or the work of the Public Consulting
19 Group.

20 BY MS. LAMBIASE:

21 Q And did you look -- so that's right. You
22 had testified earlier that the Public Consulting Group
23 was doing a financial budgetary analysis --

24 A Yes.

25 Q -- and you did not do one. Okay. Your 82

1 report talks about one of the things you were going to
2 do was a named plaintiff review or in other words a
3 review of some named plaintiffs files. Is that right?

4 A It does, yes.

5 Q And, in fact, that review didn't come. Is
6 that right?

7 A That review -- that's correct.

8 Q And on page -- specifically on page i.,
9 small i. in your executive summary in your report, you
10 state that, "The following activities were undertaken
11 to collect the data on which the findings and
12 conclusions of this study are based."

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13 A Yes.

14 Q And the second bullet says, "Review of the
15 case records of named plaintiffs in the litigation."
16 Is that correct?

17 A Yes.

18 Q Did somebody actually conduct that review of
19 the named plaintiffs' case records?

20 A Of some of those, yes.

21 Q And who was that?

22 A Charlene Ingram.

23 Q And as of the date of this report, which is
24 March 31st, 2006, just about two weeks ago, it was
25 your understanding, I guess, as the author of the

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1 report that that review was forthcoming?

2 A Yes.

3 Q And so what happened?

4 A My understanding is is that that review --
5 that's not my understanding. I know that part. That
6 review was requested with a very tight time frame.

7 Q In February?

8 MS. RACHAL: Objection to form.

9 A I don't know the actual date, but I know
10 that it was requested rather late in the process. It
11 was not something that we set out to do. And --

12 BY MS. LAMBIASE:

13 Q Wasn't part of your contract?

14 A Correct. And that Charlene did do a review
15 of some of the named plaintiffs' cases, but that
16 because of the tight time frame, she was not able to
17 complete it.

18 Q Just to see if we can get the time frame